

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE CHICAGO PAINTERS)	
AND DECORATORS PENSION FUND, et al)	
)	14 CV 7395
Plaintiffs,)	
vs.)	
)	Judge Sharon Johnson Coleman
G.L. BAILEY, INC., an Illinois corporation;)	
and GERALD BAILEY, Individually,)	Magistrate Judge Rowland
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR
JUDGMENT IN A SUM CERTAIN**

Plaintiffs, by and through their attorneys, DONALD D. SCHWARTZ, JAMES R. ANDERSON, GRANT PIECHOCINSKI, and ARNOLD AND KADJAN, move this Court to enter a final judgment against Defendant on Count I of the Complaint. In support of their Motion, the Plaintiffs state as follows:

1. This is an action to recover delinquent fringe benefit fund contributions due and owing as a result of breach of a collective bargaining agreement and the applicable provisions of ERISA.
2. The Defendants were served with the Summons and Complaint on October 14, 2014. Defendants were previously defaulted by this Court's order dated February 10, 2015.
3. An audit was necessary for Plaintiffs to prove-up their damages on Count I of the Complaint.
4. According to the Affidavit of Richard Wolf, which is attached as Exhibit 1, G.L. BAILEY, INC. owes the amount of \$22,574.96 for a specific job audit for the period from June through July, 2014., and \$1,090.20 on an audit for the period from May 1, 2013 through July 31,

2014. The total amount owed, based on the two affidavits, is \$22,665.16.

WHEREFORE, Plaintiffs pray for the following relief:

A. Enter a final judgment in favor of Plaintiffs and against the Defendants
G.L. BAILEY, INC. in the amount of \$22,665.16 on Count I of the Complaint. (A proposed
order is attached as Exhibit 2).

Respectfully submitted,

TRUSTEES OF THE CHICAGO PAINTERS et al,

S/James R. Anderson
One of Plaintiffs' attorneys

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